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9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**
16 **COMPANY,**

17 **Debtors.**

- 18 ☐ Affects PG&E Corporation
19 ☐ Affects Pacific Gas and Electric Company
20 ☒ Affects both Debtors

21 ** All papers shall be filed in the Lead Case, No.*
22 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

STIPULATION TO MODIFY SCHEDULE
REGARDING REORGANIZED DEBTORS'
OBJECTION TO CLAIM NO. 108715 FILED
BY DAVID P. ADDINGTON

[Related to Docket No. 12392]

1 PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors
2 (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases
3 (the “**Chapter 11 Cases**”), on the one hand, and Creditor David P. Addington (“**Addington**”) on the
4 other hand, by and through their counsel, hereby stipulate and agree as follows:

5 **RECITALS**

6 A. On May 16, 2022, the Court entered the *Order Sustaining Debtors’ Objection and*
7 *Granting David Addington Leave to Amend Proof of Claim #3093* [Docket No. 12392] (the “**May 16**
8 **Order**”), which (i) disallowed Mr. Addington’s Proof of Claim No. 3093, (ii) provided a schedule for
9 Mr. Addington to file an amended proof of claim and for the Reorganized Debtors to file an objection to
10 such amended claim, and (iii) set a hearing on the matter for September 13, 2022 (the “**Hearing**”).

11 B. On July 5, 2022, Mr. Addington timely filed Proof of Claim No. 108715 (the “**Amended**
12 **Claim**”).

13 C. The Reorganized Debtors have requested additional time to file their objection to the
14 Amended Claim, and Mr. Addington is agreeable to that request, provided that the September 13 Hearing
15 remain on calendar as a status conference, and therefore the Parties seek to revise the schedule set forth
16 in the May 16 Order as set forth below.

17 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, BY AND**
18 **BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES**
19 **JOINTLY REQUEST THE BANKRUPTCY COURT TO ORDER, THAT:**

- 20 1. The Stipulation is approved. The May 16 Order is modified as set forth below.
- 21 2. The Reorganized Debtors’ objection to the Amended Claim shall be filed no later than
22 September 12, 2022.
- 23 3. No notice of hearing shall be filed with the objection.
- 24 4. The Hearing on this matter scheduled for **September 13, 2022**, at 10:00 a.m. (Pacific
25 Time) shall go forward as a status conference.

26 [Signatures on Next Page]
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Dated: September 2, 2022

KELLER BENVENUTTI KIM LLP

DUANE MORRIS LLP

/s/ Thomas B. Rupp
Thomas B. Rupp
*Attorneys for Debtors and
Reorganized Debtors*

/s/ Aron M. Oliner
Aron M. Oliner
Attorneys for Creditor David P. Addington